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RESEARCH ORGANICS
ISO 9001:2000 CERTIFIED

4353 East 49th Street, Cleveland, Ohio 44125
Toll Free: (800) 321-0570 · International: (216) 883-8025
Facsimile: (216) 883-1576 · Tech Support: (800) 334-0144
E-Mail: info@resorg.com · www.resorg.com

September 12, 2008

VIA CERTIFIED MAIL
United States Environmental Protection Agency - Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

RECEIVED
DIVISION FRONT OFFICE
SEP 15 2008
LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5

Dear Regional Administrator,

Research Organics, Inc. is submitting the attached independent professional engineering assessment from HB Engineering, Inc., North Royalton, Ohio concerning repairs to our Hazardous Waste Tank (T004). This assessment was performed in compliance with regulations in 40 CFR 265.196. The documentation will be placed in the operating record and maintained until closure of the facility.

A small leak the size of a pinhole developed on September 5th, 2008 around 3:00 PM EST on the bottom of tank near the northern saddle support. The leak was identified during the daily inspection of the above ground storage tank. The tank was closed and locked out immediately. The hazardous waste was contained in the secondary containment system and was less than one (1) pound of material. This material was cleaned up immediately and will be disposed of according to all local, state, and federal regulations. All of the material in T004 was pumped out and disposed of according to Research Organics protocol.

A cleaning crew from Enviroserve JV, Independence, Ohio was contracted to clean out the tank and secondary containment system. The hazardous waste and cleaning residues were shipped off-site to Chemical Solvents Inc., Cleveland, Ohio.

NBW Inc., Cleveland, Ohio was contracted to repair the tank and HB Engineering, Inc. performed the certification to return the tank to service. This document serves as the notification report required under 265.196 (3).

Should you have any questions, please contact Research Organics, Inc. Environmental & Safety Manager, Mr. John Kolesar at (216) 883-8025 ext. 134.

Sincerely,

Robert Sternfeld, President and CEO

Cc: Kris Coder, Ohio EPA
Company File
Attachments

HB ENGINEERING, INC.

ENVIRONMENTAL ENGINEERS AND CONSULTANTS

9841 York Alpha Drive, Unit D • North Royalton, OH 44133-3514
(440) 230-1500 • Fax (440) 230-1050 • www.hbengineers.com

September 11, 2008

John Kolesar,
Environmental & Safety Manager
Research Organics, Inc.
4353 East 49th Street
Cleveland, OH 44125

Ref.: Repairs for Hazardous Waste Storage Tank No. 4.

Dear Mr. Kolesar:

This writing is in reference to my inspection and assessment on September 11, 2008 of aboveground Tank #4 following the repairs made to the primary containment. I was notified of the detection on September 5, 2008 and provided advice and file information to Research Organics staff.

A minor dripping was detected during normal daily inspection of the tank coming from the bottom, south of the fill pipe and above the front saddle support. The tank was taken out of service, emptied, and inspected on September 8, 2008. The inspection revealed several pitted areas on the inside surface at the bottom of the tank. There was no loss of any of the tank contents to the secondary containment

Research Organics, Inc. upon consultation with the contractor and me it was decided that a patch made of stainless steel would be needed to be welded over the entire area on the inside of the tank. Two (2) stainless steel plates - 0.25" thick were rolled to match the tank curvature and fit into the manway hatch, each approximately 18 x 60 inches. These two (2) pieces were welded to the tank bottom to cover the pitted areas.

The tank system utilizes a submerged fill pipe to comply with the air pollution control rules. As a result of filling close to the tank bottom, the facility installed a deflector plate made of 304 stainless steel placed underneath the fill pipe to protect the tank wall during filling.

The repaired area was tested on September 11, 2008 by the undersigned using an ultrasonic thickness gauge. The results show a wall thickness of 0.29 inches. The internal and external surfaces of the tank were examined and found free of cracks, weld breaks, and corrosion.

In order to assure the integrity of the welded area, a dye test was conducted using a fluorescent red dye tablet placed in water inside the tank. There was no dripping noticed on the outside surface of the colored water. Thereafter I informed Mr. Kolesar that the repairs are satisfactory and that Research Organics, Inc. can use the tank system.

Based on my examination of the repaired area and the tank system, it is my findings that the repairs are sufficient and the tank system is fit for use.

Please feel free to call me with any questions you may have.

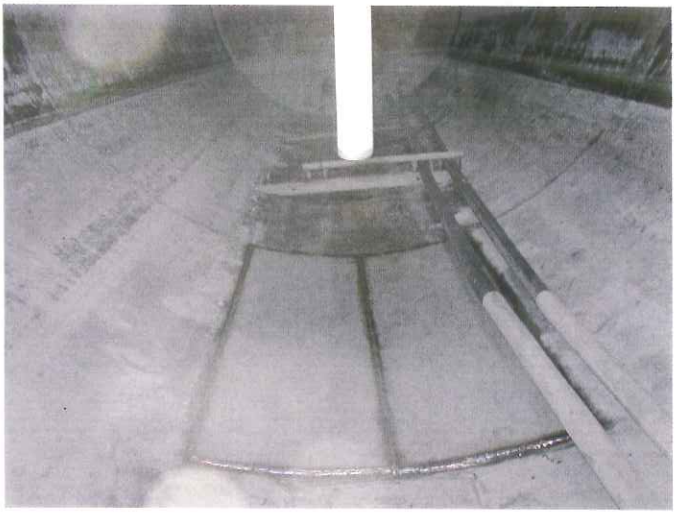
Respectfully submitted,

Ike W. Habib, P.E.
President

Cc: Rob Sternfeld, President
Glenn Miller, VP
Mike Marsh, P.E. HB Engineering, Inc.

Field Pictures

Tank No. 4 During Inspection



Tank No. 4 Showing Repaired Area

Deflector Plate Placed Underneath the Submerged Fill Pipe

Fluorescent Red Dye was used for Leak Detection